



Social Science Surveys and Interviews in the National Parks and for the National Park Service

A Guide to NPS and OMB Approvals



July 2002

**Electronic copies of this document are available on the National Park Service Social Science Program website at:
<http://www.nps.gov/socialscience/tech/survey.htm>**

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Introduction

Social science can provide park managers with valuable information about people and parks. This information can be applied to park planning, management, and efforts to improve the quality and effectiveness of National Park Service (NPS) programs. Such information can also be used to measure performance in meeting NPS goals under the Government Performance and Results Act (GPRA). To this end, the NPS conducts, funds, or sponsors studies in which information is collected from the public and/or NPS employees.

National parks are also exceptional laboratories for independent social science research. University professors, graduate students, and other researchers often conduct surveys in parks and surrounding communities. Many of these independently conducted surveys are not funded or sponsored by the NPS.

Various approval processes and research permits apply to surveys conducted, funded, or sponsored by the NPS, and to independent research conducted in parks. The approval processes are outlined here. A glossary of key terms (highlighted in bold) is also included, as well as a list of Frequently Asked Questions. Some information on NPS Scientific Research and Collecting Permits (which may be necessary for a **Principal Investigator (PI)** to obtain) is included. The information included in this brochure is derived from the following authorities:

- Paperwork Reduction Act of 1995 (Public Law 104-13, May 22, 1995)
- U.S. Code Title 44, Chapter 35: Coordination of Federal Information Policy
- Code of Federal Regulations (5 CFR Chapter III Part 1320)
- *The Paperwork Reduction Act of 1995: Implementing Guidance for OMB Review of Agency Information Collection* (Draft–August 16, 1999)
- *Department of the Interior Information Collection Packages–Collection of Information From the Public: Interim Guidelines* (March 20, 1997)
- NPS Director's Order #78: Social Science (Draft–June 2002)

Surveys of the public or any other **information collection**¹ activity conducted, funded, or sponsored by the NPS must be done in compliance with the **Paperwork Reduction Act (PRA)**. Compliance with the PRA and approval of government sponsored surveys is overseen by the Office of Management and Budget (OMB). The PRA applies to any surveys in which **identical questions** are asked of ten or more persons. Specific aims of the PRA include:

- reducing the paperwork **burden** the government places on the public
- minimizing costs of information collection activities

¹ The following are collectively referred to as information collections by the federal government: mail-back questionnaires, on-site questionnaires, face-to-face interviews, telephone surveys, and focus groups. In this brochure, information collections will be referred to simply as surveys.

- assuring that information collections meet specific agency needs
- maximizing the practical utility of such efforts, and
- avoiding collection of duplicate information

When a survey is reviewed for PRA compliance, specific attention is given to the amount of burden the information collection places on the public, the soundness of the research methodology, and the clarity of the actual **survey instrument**.

The NPS Social Science Program staff, under the direction of the Visiting Chief Social Scientist, provides technical assistance (as requested) to researchers regarding survey design, methodology, and proposal review. The NPS Social Science Program staff will work with a PI on any proposed survey to assure compliance with existing NPS, Department of the Interior (DOI) and OMB rules regarding social science research and surveys of the public. PIs may be:

- park resource management specialists
- agency scientists
- researchers from universities and organizations cooperating with the NPS, among others

The NPS Social Science Program staff processes all surveys submitted for approval, conducting a thorough administrative and technical review. Once approved by the NPS Social Science Program, proposed surveys are subsequently submitted to the DOI and/or OMB for action as necessary.

The NPS Social Science Program staff will help PIs and park managers determine which types of approval, if any, are needed. The NPS Social Science Program staff will also assist PIs with the survey submission and approval process.

If the NPS conducts, funds, or sponsors a survey, NPS and OMB approval is required. If the NPS provides significant in-kind services to a researcher conducting an independent study, NPS and OMB approval is required.

In-kind services include:

- staff assistance in survey design or administration
- housing or office space made available for researchers
- use of NPS equipment or facilities

Placement of signs announcing a study on a visitor center information desk can imply NPS sponsorship. If an independently conducted survey is intended to meet specific needs of the NPS or the study's findings are documented in a report to the NPS, the NPS appears to be the sponsor. In such cases, approval is required.

If no NPS funds or in-kind services are provided, NPS and OMB approval of the survey is not required. If an independent study is not designed to meet a specific agency need, NPS and OMB approval of the survey is not required. In such cases, only park Scientific Research and Collecting Permits may be required.

If another federal agency provides funds for a study or collects information in a unit of the National Park System, that agency, rather than the NPS, must acquire OMB approval. If survey funding is transferred to the NPS, then the NPS should acquire the approval.

NPS, DOI and OMB Survey Approval Processes

Various requirements and rules apply to different types of surveys. The key below provides simple information regarding which type of approval or permits are required for a given survey. Detailed descriptions of those approval processes follow.

1. Social Science Surveys Related to the Mission of the National Park Service (NPS) or the Study of People and Parks in the National Park System

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|---|--|
| a) Surveys of NPS Employees regarding their work..... | No OMB Approval,
Park Permits May Apply |
| b) Surveys of the Public..... | Go to 2 |

2. Surveys of the Public

- | | |
|--|--|
| a) Not Conducted, Sponsored, or Funded by the NPS..... | No OMB Approval,
Park Permits May Apply |
| b) Conducted, Sponsored, or Funded by the NPS..... | Go to 3 |

3. Surveys of the Public Conducted, Sponsored, or Funded by the NPS

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| a) Surveys of Park Visitors, Potential Visitors, and/or Residents of Communities Near Parks..... | Submit for Expedited Approval,
Park Permits May Apply |
| b) Surveys of Specialized Populations (Not Park Visitors, Potential Visitors, and/or Residents of Communities Near Parks)..... | Submit for Standard Approval,
Park Permits May Apply |

1.a) Surveys of NPS Employees

Researchers may be interested in surveying NPS employees regarding their work. Surveys of NPS employees conducted, funded, or sponsored by the NPS fall outside the scope of the PRA. No OMB approval is required. However, other policies and regulations concerning employee participation may exist. PIs should consult with NPS Human Resources personnel.

Any proposed survey of NPS employees conducted independently will be subject to the same rules as surveys of the public not funded or sponsored by the NPS. An NPS Scientific Research and Collecting Permit may be necessary.

If federal employees are surveyed in their role as private citizens, they are treated as any other person. If the survey is conducted, funded, or sponsored by the NPS, OMB approval will be required. If the survey is not conducted

using NPS funds or in-kind support, only a park Scientific Research and Collecting Permit may be needed.



2.a) Surveys of the Public Not Conducted, Funded, or Sponsored by the NPS: Technical Assistance for Park Managers and Independent Researchers

The NPS Social Science Program staff can provide technical assistance to park managers and PIs regarding independent social science research proposed in units of the National Park System. If no NPS funds are used and the NPS is not a sponsor of a survey, OMB approval is not required. An NPS Scientific Research and Collecting Permit, issued by the parks, may be necessary.

Following NPS policy and regulations, the NPS Social Science Program staff can provide park managers and PIs with technical assistance and recommendations on proposed social science research projects independently conducted in parks. The following are recommendations to NPS park managers regarding non NPS-sponsored surveys conducted in units of the National Park System:

- The park staff should review a draft of the survey instrument and sampling plan. The NPS Social Science Program staff can also review these materials if requested by a representative of the park.
- The survey instrument and accompanying materials should clearly state that the NPS is not sponsoring the information collection.
- Researchers should make it clear to potential respondents that participation in the survey is completely voluntary and that responses will be kept confidential.
- Personal contact information and data from respondents should be used for no other purpose than the specific research project covered by the research permit.
- The park should request a copy of the final report or any articles resulting from the project. A copy of such materials should also be archived with the NPS Social Science Program.

3.a) Surveys of Park Visitors, Potential Visitors, and Residents of Communities Near Parks Conducted, Funded, or Sponsored by the NPS: The Expedited Approval Process

There is an expedited PRA approval process for public surveys conducted, funded, or sponsored by the NPS. The expedited process applies to surveys of *park visitors, potential visitors, and/or residents of communities near parks*. Questions on such surveys must fall within one or more of seven specific topic areas related to individuals and their perceptions or experiences with the National Park Service. Studies that collect information from anyone other than park visitors, potential visitors, or residents of communities near parks or that ask questions outside the specific topic areas must be submitted under the standard approval process.

The specific topic areas included in the expedited approval process are:

- individual characteristics
- trip/visit characteristics
- individual activities and uses of park resources
- individual expenditures
- individual evaluation of park services
- individual perceptions of their park experiences
- individual opinions on park management

The request for expedited approval, and submission of a complete and accurate submission package, must be made *at least 45 calendar days prior* to the first day the PI wishes to administer the survey instrument to the public. The following steps apply:

- The PI prepares a complete submission package for the NPS Social Science Program. The package includes:
 - the Expedited Approval form
 - the proposed survey instrument
 - supporting documents (such as introductory scripts and follow-up letters)
- NPS Social Science Program staff and the Visiting Chief Social Scientist conduct an administrative and technical review. The Social Science Program staff work with the PI to make necessary revisions. If approved by the NPS Social Science Program, the submission is delivered to OMB.
- OMB reviews the submission, and notifies the NPS of approval, disapproval or revisions necessary.
- If approved by OMB, the NPS Social Science Program staff notifies the PI immediately and assigns an OMB control number, an NPS identification number, and an expiration date to the project.
- The PI prepares the final survey instrument and submits a file copy to the NPS Social Science Program.
- Upon completion of the survey, the PI submits a copy of any report or articles resulting from the project to the NPS Social Science Program.

A guide to this process, *Guidelines and Approval Form for Expedited Approval for NPS-Sponsored Public Surveys*, is available from the NPS Social Science Program. Electronic copies are available on the NPS Social Science Program website:

www.nps.gov/socialscience/tech/survey.htm

In addition to OMB approval, a National Park Service Scientific Research and Collecting Permit may be necessary. These permits are issued by individual park units. The application can be filed on-line at the following website:

<http://science.nature.nps.gov/research>

3.b) Surveys of Specialized Populations Conducted, Funded, or Sponsored by the NPS: The Standard OMB Approval Process

The standard OMB approval process applies to all NPS-sponsored surveys of **specialized populations** *who are not park visitors, potential visitors, or residents of communities near parks*. The standard OMB approval process applies to very few NPS-sponsored surveys. It is used only in cases where surveys are conducted with extremely specialized populations or where questions asked of the public fall outside the scope of those permissible under the program of expedited approval. Surveys submitted under the standard approval process are reviewed and approved by the NPS Social Science Program, the NPS Information Collection Clearance Officer, and the DOI Information Collection Clearance Officer in the Office of Policy Analysis prior to submission to OMB. The standard OMB approval process takes 6 to 8 months. The following steps are required:

- A 60-Day **Federal Register Notice** is published. This brief, general notice announces intent to request clearance for an information collection, and solicits public comments on the need for gathering information in the proposed study.
 - *The PI submits a draft of the 60-Day Notice to the NPS Social Science Program staff.*
 - *Once in final form, the NPS Social Science Program transmits the notice through numerous clearances within the NPS and DOI.*
 - *When cleared, the notice is sent to the Federal Register.*
 - *The NPS Social Science Program pays the publication cost.*
 - *Clearance of Federal Register Notices can take 2 months or more.*
- A final **PRA package**, using required OMB forms, is prepared and submitted to the NPS Social Science Program for review. The submission is subsequently reviewed by the NPS Social Science Program as well as NPS and DOI Information Collection Officers. The NPS Social Science Program staff communicate with PIs regarding any changes needed as a result of NPS and DOI review. If approved by the NPS and DOI, the package is submitted to OMB. The PRA package includes:
 - a completed **form 83-I**
 - a **supporting statement** consisting of a survey justification, description of methodology, and description of burden the survey places on the public
 - the survey instrument
 - a copy of the 60-Day Federal Register Notice, and a summary of any public comments and their incorporation into the final research plan
 - a draft 30-Day Federal Register Notice

Form 83-I and instructions are available from the OMB website:

www.whitehouse.gov/omb/inforeg/83i.pdf

- A 30-Day Notice is published in the Federal Register. The Notice announces submission of the study package to OMB, and solicits public comments on the proposed information collection.
 - *The PI submits a draft of the 30-Day Notice to the NPS Social Science Program staff.*
 - *Once in final form, the NPS Social Science Program transmits the notice through numerous clearances within the NPS and DOI.*
 - *When cleared, the notice is sent to the Federal Register.*
 - *The NPS Social Science Program pays the publication cost.*
 - *Clearance of Federal Register Notices can take 2 months or more.*
- OMB reviews the submission and responds with a Notice of Action (indicating approval, disapproval, or conditional approval based on required revisions) within 60 days.
- Upon approval, the PI prepares the final survey instrument and submits a file copy to the NPS Social Science Program.
- Upon completion of the survey, the PI submits a copy of any report or articles resulting from the project to the NPS Social Science Program.

The NPS Social Science Program staff can provide park managers and PIs with appropriate forms, instructions, and samples for use in preparing their submission package.

In addition to NPS, DOI and OMB approval, a National Park Service Scientific Research and Collecting Permit may be necessary. These permits are issued by individual park units. The application can be filed online at the following website:

<http://science.nature.nps.gov/research>



Categories of Inquiry Outside the Scope of NPS and OMB Approval

There are a number of categories of inquiry which are not considered to be information collections by OMB, and therefore are outside the scope of NPS and OMB approval. Several of those categories of inquiry may be relevant to the NPS. Brief descriptions follow.

1. *Affidavits, oaths, affirmations, certifications, receipts, change of address, consents, or acknowledgements*

This category pertains to facts provided by a person necessary to identify themselves and their address. For example, a park wishing to gather names and addresses for inclusion on an informational mailing list would not be subject to approval. The NPS Social Science Program recommends inclusion of a statement on any such list informing the public that leaving their name and address is purely voluntary and that name and address files will be used for no purpose other than informational mailings

2. *Facts or opinions obtained through direct observation or through nonstandardized oral communication in connection with such direct observation*

Information collected by direct observation of the public is outside the scope of NPS or OMB approval. For instance, in a study of visitor behavior in which no questions are asked, no approval is required. Questions asked of the visitors regarding their behavior (as observed by the researcher) stand outside the scope of OMB approval only if questions asked of each individual are not identical. If the same type of information is requested in regard to observed behavior, NPS and OMB approval is required. Park Scientific Research and Collecting Permits may be needed.

3. *Facts or opinions submitted in response to general solicitations of comments from the general public*

Comments solicited as a result of Federal Register Notices or in regard to other public documents are not considered to be information collections and are outside the scope of NPS and OMB approval.

4. *Facts or opinions solicited in connection with public hearings or meetings*

Individual testimony or comments in public meetings are outside the scope of NPS and OMB approval.

5. *Information solicited through nonstandardized follow-up questions designed to clarify responses to approved collections of information*

This category includes questions asked of respondents to verify or clarify their responses to surveys previously approved by NPS and OMB. For instance, in a face-to-face interview or focus group the PI may wish to have a respondent clarify their response to a given question. Such inquiry does not require approval if the question is specific to the individual's response.

Frequently Asked Questions

1. *What type of information collections require NPS and OMB approval?*

Any survey including on-site or mail-back questionnaires, face-to-face or telephone interviews, focus groups or other methods which obtain information for the NPS by means of identical questions posed to ten or more persons require NPS and OMB approval. Approval is required for any study conducted, sponsored, funded, or requested by the NPS. The approval process also applies to any information collection for which the NPS provides significant in-kind services (staff support, office resources, copying services, etc.).

2. *My study will compare information collected from park visitors with that from individuals who do not use the national parks. Which approval process must I use?*

The expedited approval process applies to all activities that collect information from park visitors, potential visitors or residents of communities near parks. A comparative study of this type falls within the scope of the expedited approval process, if the questions asked are within the scope of the specific topic areas.

3. *Do I need approval if I am surveying NPS employees?*

OMB approval is not required if information is collected from federal employees as part of their jobs. However, such studies may require a Scientific Research and Collecting Permit from the park in which it is conducted. Other important personnel policies and regulations may also apply. Information collected from federal employees regarding their role as private citizens falls within the scope of NPS and OMB approval.

4. *Is approval required for information collected in focus groups?*

Information collected in focus groups or group interviews is subject to NPS and OMB approval if the total participation in focus groups includes ten or more persons and they are asked identical questions. Even though questions may be tailored to individual respondents, the same type of information is being gathered.



5. *Do I need approval if I am surveying international visitors to national parks?*

Collections of information require OMB approval under the PRA even though all or some of the respondents may be international visitors.

6. *I am a graduate student conducting a study of national park visitors. Do I need approval for my study?*

NPS and OMB approval is required only if the study is conducted, sponsored, or funded by the NPS. If you are receiving financial or in-kind support from the NPS, approval will be required. An NPS Scientific Research and Collecting Permit may be needed.

7. *I am interested in surveying small groups of visitors to the national park where I am superintendent. Is approval required?*

NPS and OMB approval is required if identical questions are asked of ten or more persons.

8. *My research is funded by a federal grant (not from the NPS). Am I subject to NPS and OMB approval?*

Your work would need approval only if the information you are collecting is at the request of the NPS or the terms and conditions of your grant require NPS clearance of the information collection. Your study may require a Scientific Research and Collecting Permit from the park unit in which you are working. Contracts are not the same as federal grants. Many NPS social science research projects are contracted to universities and other partners. NPS and OMB approval is required in those cases.

9. *My project is being conducted as a result of a Memorandum of Understanding (MOU) between the NPS and another federal agency. The funding is from the other agency but has been transferred to the NPS. Do I need to seek NPS and OMB approval for my survey?*

In such a case, the NPS takes on the sponsorship role, even though the funds originally came from another federal agency. The study would be treated as any other project conducted, funded, or sponsored by the NPS. If, however, the other federal agency had not transferred funds and wished to do a study in a unit of the National Park System, that agency, rather than the NPS, would need to seek OMB approval.

10. *My university has an existing cooperative agreement (such as a CESU) with the NPS. Do I need to seek approval for surveys conducted under that agreement?*

Approval is required for any information collection sponsored by a federal agency. Cooperative agreements and/or contracts act as formal sponsorship arrangements. The approval process applies to specific surveys or information collection activities conducted under a cooperative agreement or other contract.

11. *I am working on a survey which is not sponsored by the NPS. I want NPS staff to comment on the instrument design. I also want to assure that my work meets needs of the NPS. Do I need approval?*

If the NPS comments on the text of your survey to the extent that it exercises control and tacitly approves it, the

agency can appear to sponsor the survey. In that case, NPS and OMB approval will be necessary. If the NPS publicly endorses your study, allows you to use the NPS arrowhead, or if you include a statement in the instructions of your survey indicating it is being conducted to meet NPS needs, OMB approval is required. If the NPS does not appear to sponsor your study, approval will not be necessary. However, such studies may require a scientific research and collecting permit from the park in which they are conducted.

12. *I have been asked by the NPS to study visitor response to interpretive exhibits. I intend to observe visitors' behavior as they approach, read, and interact with the exhibits. Will I need approval?*

Observations made by employees or contractors of the NPS are exempt from the approval process if no information is solicited from the public. Also exempt would be questions asked of the person that are specific to that individual or result from observation. However, such studies may require a Scientific Research and Collecting Permit from the park in which they are conducted.

13. *How long does the standard NPS and OMB approval process take?*

The standard approval process takes approximately 6 to 8 months. Public comment periods and separate reviews are conducted by the NPS Social Science Program, the DOI Office of Policy Analysis, and OMB. Thorough planning, well in advance of the intended start date of a survey is necessary.

14. *How long does the expedited approval process take?*

The request for expedited approval, and submission of a complete and accurate approval package, must be made at least 45 calendar days prior to the first day the PI wishes to administer the survey instrument to the public. The expedited approval process applies to studies of park visitors, potential visitors, and/or residents of communities near parks.



Glossary

Burden refers to the time expended by a member of the public in order to provide information to the federal government. Burden includes the time expended during an initial contact, reviewing instructions, and filling out a survey or providing responses in an interview or focus group.

Federal Register Notice A notice published in the *Federal Register* soliciting public comment on a proposed information collection. The first required notice (60-Day Notice) announces intent to request clearance for an information collection, and solicits public comments on the need for gathering information in the proposed study. When a full PRA package is submitted to OMB, a 30-Day *Federal Register* Notice is published requesting public comment on the full study proposal.

Form 83-I The official form used to submit a request for clearance of an information collection in compliance with the Paperwork Reduction Act.

GPRA The Government Performance and Results Act (P.L. 103-62 August 3, 1993).

Identical Questions is a term used by OMB to describe the same level of information on the same subject being asked of the public. Identical questions need not be phrased exactly the same way each time they are asked to be considered identical questions.

Information Collection is the "obtaining, causing to be obtained, soliciting, or requiring the disclosure to third parties or the public, of facts or opinions by or for an agency." Information collection may take place in the form of surveys, questionnaires, interviews, or focus groups.

PRA The Paperwork Reduction Act of 1995 (P.L. 104-13 May 22, 1995) took effect on 1 October 1995.

PRA Package The complete package of materials submitted to OMB for approval of an information collection. The PRA package includes Form 83-I, a supporting statement, a copy of the survey instrument, and copies of both 60-Day and 30-Day Federal Register Notices.

Parks refers to all types of units within the National Park System, such as national park, national preserve, national monument, national memorial, national historic site, national lakeshore, and national battlefield park among others. Also included are administrative, regional, and support offices, and program centers.

For more information, to initiate the NPS or OMB approval process, or to request a copy of *Guidelines and Approval Form for Expedited Approval for NPS-Sponsored Public Surveys*, contact:

National Park Service
Social Science Program
1849 C Street, NW (3127)
Washington, DC 20240
Fax: 202.208.4620
www/nps.gov/socialscience/tech/survey.htm

Mission Statement

The objectives of the NPS Social Science Program are to conduct and promote state-of-the-art social science related to the mission of the National Park Service and deliver useable knowledge to NPS managers and to the public

